

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
          v.                                    ) CRIMINAL NO. 15-10322-PBS  
  )  
SHANE GUNN                                    )

**MOTION TO WAIVE DEFENDANT'S PRESENCE**  
**AT THE RESTITUTION HEARING**

Defendant, Shane Gunn, respectfully requests that the Court waive his presence in Boston for the May 5, 2016 restitution hearing in this matter. As grounds for this motion, defendant states that Gunn, after consultation counsel, has directed undersigned not to oppose the government's position regarding the amount of restitution and to whom it is owed. Consequently, there will be no contested issue at the hearing and all that remains to be accomplished is the formal entry of the restitution order. Given the present posture of the hearing, there is no sound reason for the expenditure of government funds for Gunn's transportation and lodging in Boston to appear at the hearing. Moreover, limited time remains for Gunn to be with his family before his self-report to a Bureau of Prisons sentence for the lengthy sentence he must serve, and defendant would prefer to spend all time available with his family rather than in transit to and from Boston.

5/4/16  
allowed.  
counsel shall  
confer and agree  
on a restitution  
order. Datt & Sons.